

SILVERMANACAMPORA LLP
Attorneys for Talon Air, Inc.
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Hearing Date: June 2, 2009
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Objections Due: May 28, 2009
Time: 4:00 p.m.

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (BRL)

Plaintiff,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.
-----X

In re:

BERNARD L. MADOFF,

Chapter 7

Debtor.
-----X

Case No. 09-11893 (BRL)

**NOTICE OF MOTION OF TALON AIR, INC. FOR ORDER
(A) COMPELLING BLMIS TRUSTEE TO PAY AMOUNTS
OWED UNDER AIRCRAFT MANAGEMENT AGREEMENT,
(B) FIXING TIME FOR BLMIS TRUSTEE TO ASSUME OR REJECT
AIRCRAFT MANAGEMENT AGREEMENT AND (C) MODIFYING STAYS
TO PERMIT TERMINATION OF AIRCRAFT LEASE AGREEMENT**

PLEASE TAKE NOTICE, that on May 19, 2009, Talon Air, Inc. ("Movant"), a creditor of Bernard L. Madoff Investment Securities LLC ("BLMIS"), filed a motion (the "Motion") with this Court seeking entry of an order compelling Irving H. Picard (the "BLMIS Trustee") to pay certain expenses under a management agreement related to that certain Embraer Legacy 600, Model EMB-135 BJ aircraft (Serial No. 14501034) (the "Aircraft"), (b) fixing the time for the BLMIS Trustee to assume or reject the management agreement and (c) modifying the automatic stays in both the BLMIS case and the Bernard Madoff individual case to the extent necessary to permit Talon to terminate a lease agreement with BLM Air Charter LLC, a non-debtor party, relating to the Aircraft.

PLEASE TAKE FURTHER NOTICE, that a hearing (the "Hearing") will be held on June 2, 2009 at 10:00 a.m., or as soon thereafter as counsel may be heard, in connection with the entry of an order granting the relief requested in the Motion before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy (the "Court"), Alexander Hamilton U.S. Custom House, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE, that Objections to the Motion, if any, shall be filed with the Court, with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, and served on: (a) SilvermanAcampora LLP, attorneys for Talon Air, Inc., 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: Adam L. Rosen; (b) Baker & Hostetler LLP, attorneys for Irving H. Picard, 45 Rockefeller Plaza, New York, NY 10111, Attn: David Sheehan; (e) BDG Aircharter, Inc., 300 Robbins Lane, Syosset, New York 11791, Attn: David Kaplan; and (d) Alan Nisselson, Trustee, Windels Marx Lane & Mittendorf, LLP, 156 West 56th Street, New York, New York 10019, so as to be received no later than 4:00 p.m. on May 28, 2009.

Dated: Jericho, New York
May 19, 2009

SILVERMANACAMPORA LLP
Attorneys for Talon Air, Inc.

s/ Adam L. Rosen
By: _____
Adam L. Rosen
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